



The parties' request is GRANTED. The parties shall submit an executed Proposed Stipulation by **December 20, 2024**. The briefing schedule for the motion for attorneys' fees and costs is adjourned until **January 10, 2025**.

Muriel Goode-Trufant
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SO ORDERED:

Katharine H. Parker 12/12/2024
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

December 12, 2024

VIA ECF

Hon. Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *J.L. v. NYC Dep't of Education.*, 17-CV-7150 (DLC)

Dear Judge Parker:

I am the Special Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendant New York City Department of Education ("DOE") in the above-referenced matter, in which Plaintiffs, parents on behalf of two students, allege that their rights were violated due to alleged systemic delays in providing coordinated nursing and transportation services.

I write respectfully and on behalf of the parties pursuant to the Court's direction following the December 6, 2024 Settlement Conference ("Settlement Conference") (ECF No. 361) to provide an update on the status of the parties' settlement discussions regarding the proposed stipulation of settlement for Plaintiffs' substantive claims in the present action ("Proposed Stipulation"). The parties apologize for not submitting this update yesterday—the delay was occasioned by the parties' discussions regarding the Proposed Stipulation extending until today.

Since the Settlement Conference, Plaintiffs have provided Defendant the information discussed therein, and Defendant's relevant search concluded that Medicare reporting language is not applicable to the Proposed Stipulation. Accordingly, and as discussed at the Settlement Conference, Defendant provided Plaintiffs' counsel with a revised version of the Proposed Stipulation on Monday, and today, the parties agreed to its terms. Yesterday, pursuant to the agreed upon terms of the Proposed Stipulation, Plaintiffs' counsel requested from Defendant a sample affidavit of liens form, which they are currently reviewing. The parties are optimistic that they will be able to file an executed Proposed Stipulation by next week.

Additionally, and with respect to the matter of attorneys' fees and costs, Defendant made an offer of settlement on December 6, and the parties have since exchanged offers, but not yet reached a resolution. To allow time to hopefully fully resolve the matter of attorneys' fees and costs, the parties respectfully request the Court adjourn the briefing schedule until January 10, 2025. This is the parties' third joint request for an adjournment, with previous joint and unilateral requests having been granted or denied on November 13 (granted in part) (ECF No. 352), November 15 (denied) (ECF No. 354), and November 22 (granted) (ECF No. 360).

Accordingly, the parties respectfully request that the Court allow the parties until December 20 to submit an executed Proposed Stipulation, and to adjourn the current briefing schedule until January 10, 2025.

Thank you for considering this submission and requests.

Respectfully submitted,

/s/

Lauren Howland, Esq.
Special Assistant Corporation Counsel

cc: All Counsel of record (via ECF)